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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

BERNADETTE EILEEN KEY, an individual,

Plaintiff,

v.

HNJ MIRACLE MILE L.L.C., a Domestic  
Limited-Liability Company; DOE EMPLOYEES  
OF HNJ MIRACLE MILE L.L.C.; DOES I  
through X; and ROE Corporations I through X,  
inclusive,

Defendants.

CASE NO. 2:21-cv-01354-JCM-EJY

**JOINT PROPOSED DISCOVERY PLAN  
AND SCHEDULING ORDER**

**SUBMITTED IN COMPLINACE WITH  
LR 26-1 (e)**

Plaintiff, BERNADETTE EILEEN KEY, and Defendant, HNJ MIRACLE MILE L.L.C.  
(collectively, the “Parties”) by and through their respective counsel, hereby submit their Joint  
Proposed Discovery Plan and Proposed Scheduling Order pursuant to FRCP 26(f) and LR 26-1 (a):

1. The following persons participated in the discovery planning conference on August 12,  
2021 as required by FRCP 26(f) and LR 26-1(a):
  - a. Betsy C. Jefferies, Esq. for Plaintiff Bernadette Eileen Key; and
  - b. Gregory M. Schulman, Esq. for Defendant HNJ Miracle Mile L.L.C.
2. Initial Disclosures- FRCP 26(a)(1): The Parties already exchanged Initial Disclosures  
pursuant to FRCP 26(a)(1).
3. Subjects of Discovery: Discovery is necessary regarding the following subjects
  - a. Plaintiff’s personal injury claims; and

b. Defendants' affirmative defenses and general defenses thereto.

4. Limitations on Discovery: For the present, the Parties do not see a need to impose limitations on discovery.
5. Other Discovery Orders: No other discovery orders are presently needed.
6. Discovery Cut-Off Date: The last day to conduct discovery, which is one hundred eighty (180) days from August 4, 2021, shall be **January 31, 2022**.
7. Amending the Pleadings and Adding Parties: The deadline to amend the pleadings and add Parties is **November 2, 2021**, 90 days prior to the close of discovery, as required by LR 26-1(b)(2).
8. Disclosures (Experts) – FRCP 26(a)(2): Expert witness disclosures under FRCP 26(a)(2)(D) and LR 26-1(b)(3) must be made by **December 2, 2021**, 60 days before the discovery cut-off date. Disclosures for rebuttal experts must be made by **January 3, 2022**, 30 days after the initial disclosures of experts.
9. Dispositive Motions: The deadline for filing dispositive motions will be **February 28, 2022**, 28 days after the discovery cut-off date, as required by LR 26-1(b)(4).
10. Pretrial Order: The joint pretrial order must be filed by **March 28, 2022**, 30 days after the date set for filing dispositive motions, as required by LR 26-1(b)(5). In the event dispositive motions are filed, the date for filing the joint pretrial order shall be suspended until 30 days after the decision of the dispositive motions or further order of the court.
11. FRCP 26(a)(3) Disclosures: The disclosures required by FRCP 26(a)(3) and any objections thereto, shall be included in the joint pre-trial order.
12. Any stipulation or motion to extend a discovery deadline must be made not later than 21 days prior to the expiration of the subject deadline sought to be extended and must fully comply with LR 26-3.
13. Pursuant to LR 26-1(b)(7) the Parties certify that they met and conferred about the possibility of using alternative dispute resolution processes including mediation, arbitration, and/or early evaluation.

1 14. Pursuant to LR 26-1(b)(8) the Parties certify that they considered consent to trial by a  
2 magistrate judge under 28 U.S.C. § 636(c) and Fed. R. Civ. P. 73 and the use of the  
3 Short Trial Program (General Order 2013-01).

4 15. Pursuant to LR 26-1(b)(9) the Parties certify that they discussed whether they intend to  
5 present evidence in electronic format to jurors for the purposes of jury deliberations. No  
6 stipulations were reached regarding same.

7 16. This document complies with LR 26-1(b)(10).

8 DATED this 3<sup>rd</sup> day of September 2021.

DATED this 3<sup>rd</sup> day of September 2021.

9 GINA CORENA & ASSOCIATES

THORNDAL ARMSTRONG DELK  
BALKENBUSH & EISINGER

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11 /s/ Betsy C. Jefferis-Aguilar

/s/ Gregory M. Schulman

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17 **IT IS SO ORDERED:**

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20 UNITED STATES MAGISTRATE JUDGE

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22 DATED: September 3, 2021  
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